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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Moses Manuel Chavarin,
Plaintiff,

vs.

Frank Bisignano, COMMISSIONER
OF SOCIAL SECURITY¹,
Defendant.

Case No. 1:25-cv-00810-KES-BAM
STIPULATION AND ~~PROPOSED~~
ORDER FOR EXTENSION OF
TIME

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from October 3, 2025 to December 2, 2025, for Plaintiff to serve on defendant with PLAINTIFF'S

¹ Frank Bisignano became the Acting Commissioner of Social Security on May 7, 2025. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Frank Bisignano should be substituted for Leland Dudek as the defendant in this suit. No further action need be taken to continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

1 MOTION FOR SUMMARY JUDGEMENT. All other dates in the Court's
2 Scheduling Order shall be extended accordingly.

3 This is Plaintiff's first request for an extension of time. Plaintiff respectfully
4 states that the requested extension is necessary due several merit briefs being due
5 on the same week. For the weeks of September 22, 2025 and September 29, 2025,
6 Plaintiff's Counsel has fourteen briefs due and three replies due. Counsel requires
7 additional time to brief the issues thoroughly for the Court's consideration.
8 Defendant does not oppose the requested extension. Counsel apologizes to the
9 Defendant and Court for any inconvenience this may cause.

10
11 Respectfully submitted,

12 Dated: September 30, 2025 PENA & BROMBERG, ATTORNEYS AT LAW
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14 By: /s/ Jonathan Omar Pena
15 JONATHAN OMAR PENA
16 Attorneys for Plaintiff
17

18 Dated: September 30, 2025 ERIC GRANT
19 United States Attorney
20 MATHEW W. PILE
21 Associate General Counsel
22 Office of Program Litigation
23 Social Security Administration

24 By: */s/ Oscar Gonzalez de Llano
25 Oscar Gonzalez de Llano
26 Special Assistant United States Attorney
27 Attorneys for Defendant
28 (*As authorized by email on September 30, 2025)

ORDER

Based upon the parties' stipulation, and for cause show, IT IS ORDERED that:

- Plaintiff shall have a 60-day extension of time, from October 3, 2025 to December 2, 2025, for Plaintiff to serve Defendant with Plaintiff's motion for summary judgment; and
- All other dates in the Court's Scheduling Order shall be extended accordingly.

IT IS SO ORDERED.

Dated: October 1, 2025

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE